

FILED

JUN 27 2019

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUISUNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

KEITH D. MCCRADY,

Defendant.

No.

4:19CR00493 JAR/NCC**MOTION FOR PRETRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Jennifer J. Roy, Assistant United States Attorneys for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with one count of felon in possession of a firearm in violation of United States Code, Section 922(g).
2. According to St. Louis Metropolitan Police Department ("SLMPD") 19-018681, upon observing the defendant's vehicle commit a traffic violation, the officers activated emergency lights and siren to curb the vehicle. When defendant pulled over his car, the front seat passenger jumped out of the car and fled on foot. The defendant advised the police that the passenger was in possession of "Crack." One of the officers observed the defendant, who was still seated in the car, handling a firearm. The officers asked the defendant to step out of the car and recovered a loaded semi-automatic pistol from under the driver's seat. The defendant acknowledged the presence of

the firearm and advised he had it for his protection and that he knew it would catch up with him one day.

3. The defendant's criminal history reflects that he has several prior felony convictions in Missouri and Illinois for: Forgery, Theft, Possession of Controlled Substances, and Unlawful Use of a Weapon.

4. Therefore, pursuant to Title 18, United States Code, Section 3142(g), the circumstances of the charged conduct; the weight of the evidence against the defendant; and the defendant's history and characteristics, which includes a substantial number of felony convictions, reflects that the defendant is a flight risk and a danger to the community and should be detained pending trial.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the Government requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

JEFFREY B. JENSEN
United States Attorney

BY: /s/ Jennifer J. Roy
JENNIFER J. ROY, #47203MO
Assistant United States Attorney